

Robert P. Goe – SBN 137019
Reem J. Bello – State Bar No. 198840
GOE FORSYTHE & HODGES LLP
17701 Cowan, Suite 210, Building D
Irvine, CA 92614
RGoe@goeforlaw.com
RBello@goeforlaw.com
Telephone: (949) 798-2460
Facsimile: (949) 955-9437

Attorneys for Joseph Vago and Erica Vago,
Defendants

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION

In re:

LESLIE KLEIN,
Debtor.

LESLIE KLEIN, an individual,
Plaintiff,

v.

JOSEPH VAGO, and ERICA VAGO,
individuals,
Defendants.

Case No. 2:23-bk-10990-SK

Chapter 11 Proceeding

Adv. Case No.: 2:23-ap-01147-SK

**STIPULATION ON ORDER TO EXTEND
DEADLINE OF DEFENDANTS TO
RESPOND TO COMPLAINT**

**TO THE HONORABLE SANDRA R. KLEIN, UNITED STATES BANKRUPTCY JUDGE,
AND ALL PARTIES IN INTEREST:**

Joseph Vago and Erica Vago, defendants (“Defendants”) in the above-captioned adversary proceeding and Plaintiff Leslie Klein (“Plaintiff” or “Debtor”), each of which is being referred to as a “Party,” or together, the “Parties,” through their respective counsel, respectfully submit for consideration of this Court this Stipulation:

The following facts are admitted and require no proof:

1. Debtor filed the instant bankruptcy case on February 22, 2023.
2. Plaintiff filed the First Amended Complaint in the instant adversary proceeding on May 12, 2023.
3. The Summons and Notice of Status Conference reflect service on the Defendants on May 19, 2023.
4. Defendants' response to the First Amended Complaint is due on June 18, 2023.
5. The Parties have agreed that Defendants' deadline to respond to the First Amended Complaint shall be extended to July 18, 2023.
6. There have been no prior extensions.

WHEREFORE, the Parties do respectfully request the Court enter an order approving the Stipulation.

Dated: June 13, 2023

GOE FORSYTHE & HODGES LLP

By: /s/Robert P. Goe
ROBERT P. GOE, ESQ.
Attorneys for Defendants JOSEPH VAGO
and ERICA VAGO, individuals

Dated: June 13, 2023

~~LAW OFFICES OF MICHAEL JAY
BERGER~~

By: 
ERIC J. OLSON, ESQ.
Attorneys for Leslie Klein, Plaintiff

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan, Suite 210, Bldg. D, Irvine, CA 92614

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION ON ORDER TO EXTEND DEADLINE OF DEFENDANTS TO RESPOND TO COMPLAINT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 14, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Reem J Bello** rbello@goeforlaw.com, kmurphy@goeforlaw.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **Michael I. Gottfried** mgottfried@elkinskalt.com, cavila@elkinskalt.com, lwageman@elkinskalt.com, docketing@elkinskalt.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Clarisse Young** youngshumaker@smcounsel.com, levern@smcounsel.com

2. SERVED BY UNITED STATES MAIL:

On (*date*) June 14, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Eric J Olson
EJOlson Law
100 W Broadway #990
Glendale, CA 91210

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) June 14, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 14, 2023 Susan C. Stein

Date

Printed Name

/s/Susan C. Stein

Signature